

The Honorable Ricardo Martinez

UNITED STATES DISTRICT COURT
OF WASHINGTON
AT SEATTLE

JULIE DALESSIO, an individual,

Plaintiff,

v.

UNIVERSITY OF WASHINGTON,

Defendant.

No. 2:17-cv-00642-RSM

DECLARATION OF ANDREW
PALMER IN SUPPORT OF
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT

I, Andrew Palmer, declare as follows:

1. I am over the age of 18, and am otherwise competent to testify as to all matters herein, and make the following statements based on my own personal knowledge.

2. I began working at the University of Washington Office of Public Records January 2007 and have been a Compliance Analyst with the University since July of 2015. Prior to working as a Compliance Analyst, I was an Assistant Public Records Officer from January 2007 until April of 2012.

3. Prior to Plaintiff's first public records request (PR 2016-00218), I did not know Ms. Dalessio and, to the best of my knowledge, had never spoken to her.

4. I was the public records employee that completed Plaintiff's third public records request (PR 2016-00760). The request was for "my (Dalessio's) departmental personnel file" along with other records associated with her personally. Based upon our

**DECLARATION OF Andrew Palmer in support of
defendants' motion for summary judgment - 1**
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1 standard practice, we interpreted the request as a former employee's request for her own
2 file, meaning it would not be redacted.

3 5. The University produced 1142 pages of documents related to Plaintiff's
4 employment to Plaintiff herself.

5 6. The following are exhibits cited or relied upon in Defendant's Motion for
6 Summary Judgment of which I have personal knowledge:

7 A. Attached as **Exhibit A** is a true and correct copy of Plaintiff's Public
8 Records Request dated November 9, 2016 and the corresponding release
9 letters.

10 I declare under penalty of perjury under the laws of the State of Washington that the
11 foregoing is true and correct to the best of my knowledge.

12 DATED this 15th day of August, 2017, at Seattle, Washington.

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15 _____
16 Andrew Palmer

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**DECLARATION OF Andrew Palmer in support of
defendants' motion for summary judgment - 2**

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